

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

LATHAM & WATKINS LLP,

Plaintiff,

v.

HIRING-LW.COM,

Defendant.

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) Civil Action No. 1:17-cv-01368-LMB-JFA
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**REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT HIRING-LW.COM
AND DECLARATION OF COUNSEL IN SUPPORT THEREOF**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Latham & Watkins LLP (“Latham”) respectfully requests that the Clerk enter default in this matter against Defendant hiring-lw.com (“Defendant”). Defendant has failed to appear, answer, or otherwise respond to Latham’s Complaint within the time prescribed by this Court’s March 16, 2018 Order, *see* ECF No. 14.

1. On November 30, 2017, Latham filed its Complaint against Defendant. (ECF No. 1).

2. On March 16, 2018, after several diligent yet unsuccessful attempts to effect service upon Defendant, Latham filed a Motion to Waive Service by Publication (“Latham’s Motion”). (ECF No. 10).

3. On March 16, 2018, this Court denied Latham’s Motion and ordered that, among other things, Latham publish a copy of the Court’s Order in the Washington Post or Washington Times and serve a copy of the Order upon Defendant via FedEx Priority Mail and email. The Court also ordered that any answer or response to the Complaint was due 21

days from the date of publication of the Order in the Washington Post or Washington Times.
("Court's Order"). (ECF No. 14).

4. Latham published the Court's Order in the Washington Post on March 22, 2018 and served a copy of the Court's Order upon Defendant via FedEx Priority Mail on March 19, 2018 and via email on March 21, 2018. (ECF No. 16).

5. Pursuant to this Court's Order, Defendant's response to the Complaint was due on April 12, 2018.

6. To date, Defendant has not appeared, answered, or otherwise responded to Latham's Complaint.

Accordingly, Latham respectfully requests that the Clerk enter default against Defendant hiring-lw.com

Dated: May 11, 2018

Respectfully submitted,

LATHAM & WATKINS LLP

By /s/Bert C. Reiser
Bert C. Reiser (VA Bar No. 31856)
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*Attorneys for Plaintiff
Latham & Watkins LLP*

DECLARATION OF COUNSEL
IN SUPPORT OF LATHAM'S REQUEST FOR ENTRY OF DEFAULT

I, Bert C. Reiser declare, under penalty of perjury, that all of the statements set forth above, in support of Latham's Request for Entry of Default, are true and correct, to the best of my knowledge, information and belief.

Dated: May 11, 2018

/s/Bert C. Reiser

Bert C. Reiser (VA Bar No. 31856)

CERTIFICATE OF SERVICE

I certify that on May 11, 2018 I caused a copy of the foregoing to be served on the following via U.S. Mail:

Perfect Privacy LLC
12808 Gran Bay Parkway West
Jacksonville, FL 32258

and via email upon:

5felv03raug3i88j53b2k4frj7@domaindiscreet.com

/s/Bert C. Reiser

Bert C. Reiser (VA Bar No. 31856)

bert.reiser@lw.com